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Attorney for Defendant  
TIMOTHY GLEN CURRY

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHRIS PRINCIPE,  
  
Plaintiff,  
  
v.

TIMOTHY GLEN CURRY A/K/A  
TIMOTHY TAYSHUN,  
  
Defendant.

) Case No. 8:17-cv-00608 JLS (KESx)  
)  
) **STIPULATION TO CONTINUE**  
) **HEARING ON MOTION FOR**  
) **PRELIMINARY INJUNCTION**  
) **ORDER AGAINST HARASSMENT**  
) **[DKT. 27]**  
) Current Hearing Date  
)  
) DATE: December 1, 2017  
) TIME: 2:30 p.m.  
) CTRM: 10A  
)  
) Proposed Hearing Date  
)  
) DATE: December 22, 2017  
) TIME: 2:30 p.m.  
) CTRM: 10A  
)  
) Hon. Josephine L. Staton

1 The parties, through their counsel of record, stipulate to continue the hearing on  
2 Plaintiff's Motion for Preliminary Injunction Order Against Harassment until  
3 December 22, 2017, and they request that the Court enter an order to that effect. The  
4 parties also request that the Court enter an order deeming Defendant's opposition as  
5 having been timely filed. The parties do not enter into this stipulation for the purposes of  
6 delay but instead do so because they reasonably believe that, if the hearing is continued,  
7 they may be able to resolve the issues presented in the motion without requiring the Court  
8 to issue a ruling on the motion. Continuing the hearing would also allow Plaintiff  
9 additional time to prepare his reply given the filing date of Defendant's opposition.

10 This stipulation is based on the following facts:

- 11 1. Plaintiff filed his motion on October 20, 2017. Dkt. 27.
- 12 2. Defendant's opposition to the motion was due on November 9, 2017.  
13 Fed. R. Civ. P. 6(a)(1)(C), 6(a)(6)(A), & 6(a)(5). When Defendant did not file his  
14 opposition by this date, Plaintiff filed a statement of non-opposition, requesting that the  
15 Court grant the motion as conceded per Local Civil Rule 7-12. Dkt. 30.
- 16 3. Defendant filed his opposition on November 13, 2017. Dkt. 31. As a result,  
17 Plaintiff has had less time to prepare his reply memorandum than would normally be  
18 permitted. The reply is currently due on November 17, 2017.
- 19 4. The parties' respective counsel have discussed this matter and reasonably  
20 believe they may be able reach a stipulation concerning a compromise on the relief  
21 sought in Plaintiff's motion, thus potentially allowing Plaintiff to withdraw parts of or the  
22 entire motion.

23 The parties therefore request that the Court deem Defendant's papers as having  
24 been timely filed and continue the hearing on the motion to December 22, 2017<sup>1</sup>, both to  
25 allow Plaintiff sufficient time to prepare his reply and to allow the parties time to attempt  
26 to negotiate a stipulated order that obviates the need for the Court to rule on Plaintiff's  
27 motion.

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28 <sup>1</sup> December 22, 2017 is the first available motion date on the Court's calendar that is not  
currently closed.

**SO STIPULATED.**

DATED: November 16, 2017

Tucker Ellis LLP

By: /s/Steven E. Lauridsen

Howard A. Kroll  
Steven E. Lauridsen

Attorneys for Plaintiff  
CHRIS PRINCIPE

DATED: November 16, 2017

Law Office of Daniel A. De Soto

By: /s/Daniel A. De Soto\*

Daniel A. De Soto

Attorneys for Defendant  
Timothy Glen Curry

\*Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that Defendant's counsel concurs in the content of this stipulation and has authorized its filing with his electronic signature.